



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L6606/1995/9	Licence file number:	2012/006879
Licence holder:	BHP Nickel West Pty Ltd		
Trading as:			
ACN:	004184598		
Registered address:	125 St Georges Terrace PERTH 6000		
Reporting period:	01/08/2021 to 31/07/2022		

Section B – Statement of Compliance with Licence Conditions

Did you comply with all of your licence conditions during the reporting period?
(please tick the appropriate box)

- ☐ Yes – please complete:
- section C;
 - section D if required; and
 - sign the declaration in Section F.

- ☒ No – please complete:
- section C;
 - section D if required;
 - section E; and
 - sign the declaration at Section F.

Section C – Statement of Actual Production

Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.

Prescribed Premises Category	Actual Production Quantity
54 – Sewage Facility Premise	N/A

Section D – Statement of Actual Part 2 Waste Discharge Quantity

Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.

Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
54	386 cubic metres per day

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.3	Date(s) of non-compliance:	21/12/2022
Details of non-compliance:			
Dried biosolids not stored in sealed skip bins.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No visible environmental impact.			
Cause (or suspected cause) of non-compliance:			
Limited area within the fenced off facility to locate and drop off / pick up a sealed skip safely. Temporary storage of dried biosolids only, therefore once stockpile has reached a certain (viable) tonnage it is transferred to the Leinster Mine directly for appropriate disposal.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Leinster Town Maintenance and Non-Process Infrastructure (NPI) team will start to re-utilise sealed skip bins for the temporary storage of dry biosolids.			
Potential for concrete pad construction once applied and approved for future licence amendment.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	1.3.4	Date(s) of non-compliance:	21/12/2022
Details of non-compliance:			
Containment structure wall integrity is compromised as there is evidence of treated effluent pooling outside the pond facility, plus many of the facility interception trenches are full of treated effluent.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>No visible environmental impact, as the minor salt crusting has only impacted areas that contain the facility ring road or are naturally devoid of native vegetation.</p>			
Cause (or suspected cause) of non-compliance:			
Facility walls are built with in situ material (as stipulated by the operating licence (Table 1.3.3)). In situ material is quite sandy in nature therefore has limited ability to wholly contain treated effluent. This area also features hard pan substrate, just below the surface, which again impacts the containment of treated effluent.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>A solar pump has been installed (that replaces the petrol driven trash pump, that had operational limitations). This has enabled increased transfer of treated effluent from the interception trench back into the evaporation ponds.</p> <p>Remedial earthworks, to rectify the structural integrity of the walls, are also scheduled to be undertaken on the pond embankments for late summer 2023. This timing allows the ponds and embankment walls to dry out as much as possible.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.4	Date(s) of non-compliance:	21/12/2022
Details of non-compliance:			
Vegetation establishment on the pond embankments.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact.			
Cause (or suspected cause) of non-compliance:			
Practice of spraying the embankment walls stopped, cause of interruption to spraying practice due to delay in onboarding new contractor.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The business has engaged a third party contractor to complete management of vegetation establishment along facility embankment walls in late autumn 2022. Third party contractor commencement date has been impacted by not receiving required equipment that will ensure safe and successful execution of required tasks. Planned remedial earthworks on the pond embankments (for late summer 2023) will result in the removal of most, if not all, of the established vegetation.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	5.1.1 (c)	Date(s) of non-compliance:	21/12/2022
Details of non-compliance:			
Log books recording daily facility inspections were disposed of, facility currently only has daily inspection records stretching back to 2020 rather than the required six years.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact.			
Cause (or suspected cause) of non-compliance:			
Lack of awareness of operating licence document management requirements by the facility operators.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The environmental team has reiterated to the Non-Process Infrastructure (NPI) team, the requirement to maintain inspection records and associated documentation for 6 years. NPI to establish an electronic database for these records.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section F – Declaration

I/We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular¹. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	30-Dec-2022	Date:	
Seal (if signing under seal):	Technical Manager Concentrators, Minerals Processing		

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder